

Notes
Bradford Island EPA/USACE Check-in
July 14, 2022

EPA Participants: Helen Bottcher, Rich Francis, Elizabeth Allen, Tim Maley, Kathleen Pesheck

USACE Participants: Chris Budai, Kristen Kerns

Community Interviews – Chris reported that:

- Interviews started this week. Chris was out at the site with USACE's contractor.
- Monday night – presented to Cascade Locks City Council. They will help spread the word, post on their web site
- Tuesday – at Visitor's Center on Bradford Island. Set up in parking lot. Also went to the fishing platform's parking lot around Bonneville. Learned that Friday afternoon is a good time to catch people at this location, so contractor will go back then.
- Today – targeted fishing areas again, will be at Stevenson, WA library
- Next Thursday – will present to Stevenson City Council
- People can also sign up for virtual interviews through mid-August

Community Involvement Plan – USACE did use Laura Knudsen's input to revise questions. Broke questions up by groups such as city and local government, Tribes, neighbors / local residents.

Helen asked for a copy of the revised interview questions. Chris said the questions were used as a guide during the interviews and not handed out as a formal questionnaire.

Tribal Input – USACE had a meeting with Yakama about the community interviews that did not go well. Meeting initiated by Yakama (Rose Longoria). Chris explained that Rose said Yakama is part of a government team that will be directing USACE now that the site is listed. Discussion contentious, ended abruptly by Yakama. Rich affirmed that EPA never told the tribes that Yakama would be directing USACE work. USACE position is that any discussion about the FFA should stay solely among the regulators, including EPA as a signatory to the FFA and the support agencies, ODEQ and WA DOE.

Tribal Involvement through Community Advisory Group (CAG) – Chris explained that USACE will release QAPPs and other technical documents at CAG meetings, so everyone (Tribes, public, EPA, States) will get them at the same time and everyone will have the opportunity to provide comments.

EPA plans to begin Technical Coordination Team meetings – Helen announced that EPA was planning to begin holding technical meetings with Oregon, Washington, and the Tribes. EPA hopes that USACE will reverse its position that these meetings violate FACA and join in. Chris very worried that EPA will undermine USACE authority and the attempt to have all technical discussions be through the CAG and be open to the public, as required under CERCLA. (EPA does not agree that CERCLA requires all technical discussions be through the CAG and open to the public.) Chris also expressed concern that EPA and USACE won't be aligned.

USACE A&E Contract for River OU

- USACE is in the process of getting this contract awarded. Bill Gardiner is lead.

- Will develop a draft sampling plan and QAPP for review and comment. Hope to have draft to share in the fall, but this depends on when the contract is awarded.
- Contract includes outside experts to help identify data gaps and remedial technologies.
- Still working out internally about when to engage EPA
- Previous TAG input on conceptual site model will inform USACE plan
- Will require divers to set sediment traps, current meters, collect sediment/substrate samples
- Hope to sample before April 2023 when spill starts

Four follow-up items to June 23 EPA-USACE meeting at Bradford Island – Helen asked about status

1. Governance structure / partnering approach for agency coordination and a strategy for how we would elevate issues among our teams (project management level, management level, and executive level).
 - Chris said USACE is still working on this and that this is part of the FFA so attorneys will need to discuss. Rich said that is not EPA's understanding or expectation; we need a governance structure now to resolve disagreements in the interim period, until an FFA with its dispute resolution procedure is in place, as was discussed among the managers at the Bradford site visit on June 23rd.
2. Technical point of contact (at CX) for the FFA
 - See above (part of FFA so attorneys will need to discuss)
3. Write-up on case where USACE had concerns about FACA violations. EPA hoping to understand how the facts in that case inform a CERCLA coordination team
 - See above, USACE stated that the FACA issue was part of the FFA, so attorneys will need to discuss. EPA disagreed that the issue was FFA related, and that it related instead to the disbanding of the TAG. USACE stated that it was still a legal issue that would need to be discussed by the attorneys.
4. Project documents being reviewed by USACE FFA team. EPA requested list of documents so they could start their review.
 - Chris said the list will be shared when it is finalized with the FFA team. USACE will provide a list of primary and secondary documents to the FFA team through the attorneys.

Groundwater Data Report. Dan Carlson is the lead author. He has all the data, is waiting for final data validation. Will be just a data report, no interpretations. Report is expected in October.

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- USACE will focus on data collection and analysis until the FFA is signed.
- No remedial alternatives for the sandblast area and source control RAOs will be developed until the FFA is signed to avoid rework.
- Helen asked if risk assessments will be re-done / updated. Kristen explained that they will, but only to make sure nothing was missed. Were COCs missed that would change the risk conclusion or cleanup footprint? Could bring in additional COCs if concentrations increased in this last round of data from the Sandblast Grit Area, for example.